Norris A. Adams, II Robert S. Blair, Jr. † Jonathan E. Buchan, Jr. Edward G. Connette Heather W. Culp John T. Daniel



Richard A. Elkins Lauren V. Lewis † Stephen H. Morris Natalie D. Potter* Caitlin H. Walton

* Also admitted in MD † NC Board Certified Specialist in Family Law Retired Kenneth F. Essex Channing O. Richards

npotter@essexrichards.com Direct dial: 704-285-1111

June 27, 2018

Mark W. Ishman Ishman Law Firm, P.C. 9660 Falls of Neuse Road Suite 138-350 Raleigh, NC 27615 Via U.S. Regular Mail and Email to: mishman@ishmanlaw.com

Re: Baronius Press, Ltd. V. Saint Benedict Press, LLC 3:16 ev-00695-GCM (USDC – WDNC)

Dear Mark:

Enclosed are documents bates stamped SBPP-03386 to SBPP-03392 designated "Confidential – For Attorney's Eyes Only." Please note, that we have redacted the percentages that Mr. Madrid received as they are trade secrets not related to this case and relate only to Mr. Madrid's other works.

As previously stated, Mr. Madrid did not write a preface to *Fundamentals of Catholic Dogma* that was used by Saint Benedict Press. Saint Benedict Press has not located any other documents regarding Patrick Madrid relating to *Fundamentals of Catholic Dogma*.

Please let us know when you are available this week for us to meet and confer regarding Plaintiff's deficient responses to Defendant's Second Set of Interrogatories and Requests for Production of Documents.

Jonathan E. Buchan Natalie D. Potter

NDP/hmb Enclosure

> Attorneys at Law | 1701 South Boulevard, Charlotte, North Carolina 28203 www.essexrichards.com | 704.377.4300 phone | 704.372.1357 fax

